Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

In the Matter of		
)		
NEXTEL PARTNERS PETITION FOR LIMITED WAIVER)	
OF THE DECEMBER 31, 2005 DEADLINE TO ACHIEVE)	WT Docket
05-302		
95% PENETRATION OF LOCATION-CAPABLE HANDSE	TS)	

REPLY COMMENTS OF NENA

The National Emergency Number Association ("NENA") hereby responds to the comments of others in the captioned proceeding. Because Motorola's comments in support of Nextel Partners are similar to the company's endorsement of the Sprint Nextel request in WT Docket 05-286, NENA incorporates by reference the views it expressed earlier.¹

At least one statement by Motorola appears to be new:

Nextel Partners' customers, however, are generally content with their handsets and as a result are hesitant to swap them for the newer A-GPS handsets. From the customer perspective, such a swap could result in a significant loss of employee productivity or lost time due to the need to reprogram the new handset without any real increased functionality.²

Leaving aside whether re-programming of a new phone has any serious effect on employee productivity, NENA is perplexed by Motorola's claim that an A-GPS handset permitting automatic 9-1-1 caller location ("ALI") represents no "real

² Comments, November 4, 2005, 2 (emphasis added).

 $^{^{1}}$ Reply Comments, October 31, 2005, 2.

increased functionality." Surely providing emergency responders with a customer's precise location when making a wireless

9-1-1 call is a tremendously increased functionality.

NENA asks that no weight be given to the above claim in evaluating the Nextel Partners' waiver request.

Respectfully submitted,

NENA

By_____

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